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Attorneys for Counsel Press, Inc., Gladstone Investment Corporation, Gladstone Management Corporation, Gladstone Administration, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re:	:	Chapter 11
	:	
Z & J, LLC d/b/a APPEAL TECH,	:	Case No. 19-11502 (JLG)
	:	
Debtor.	:	
	:	
-----	X	
Z & J, LLC d/b/a APPEAL TECH,	:	
	:	
Plaintiff	:	
	:	
v.	:	Adv. Pro. No. 19-01435
	:	
LAURENCE MYNES, et al.,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF MOTION OF DEFENDANTS FOR
MANDATORY ABSTENTION, PERMISSIVE ABSTENTION AND REMAND**

PLEASE TAKE NOTICE that on December 23, 2019, Counsel Press, Inc., Gladstone Investment Corporation, Gladstone Management Corporation, and Gladstone Administration, LLC (“Movants”) filed with the United States Bankruptcy Court for the Southern

District of New York (the “Bankruptcy Court”) the annexed motion (the “Motion”), pursuant to 28 U.S.C. §1334(c) and 1452(b), and Rules 9014 and 9027(d) of the Federal Rules of Bankruptcy Procedure, for mandatory abstention, permissive abstention and remand. A hearing on the relief requested in the Motion will be held before the Honorable James L. Garrity Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 601, New York, New York 10004 on the **30th day of January, 2020 at 10:00 a.m. (prevailing Eastern Time)** (the “Hearing”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion (the “Objections”) must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) by registered users of the Bankruptcy Court’s case filing system, electronically, and (b) by all other parties in interest, on a CD-ROM or other electronic media, in text-searchable portable document format (PDF) (with a two hard copies delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court, to the extent applicable, and served on (a) counsel to Movants, Blank Rome LLP, 1271 Avenue of the Americas, New York, New York 10020 (Attn: Jeffrey Rhodes and Evan J. Zucker); and (b) entities that requested notice in the above-captioned case under Bankruptcy Rule 2002, so as to be received no later than **January 23, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, Movants may, on or after the Objection Deadline, submit to

the Bankruptcy Court the proposed order attached to the Motion as Exhibit A, which may be entered with no further notice or opportunity to be heard.

Dated: New York, New York
December 23, 2019

Respectfully Submitted

BLANK ROME LLP

By: /s/ Evan J. Zucker
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